



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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APR 23 2004

Michael P. Last, Esq.  
Counsellor at Law  
One Financial Center  
Boston, Massachusetts 02111-2659

Re: Cornell-Dubilier Electronics Superfund site  
South Plainfield, New Jersey

Dear Mr. Last:

This is in response to your letter, dated April 1, 2004, regarding the Cornell-Dubilier Electronics (CDE) Superfund site, located in South Plainfield, New Jersey. Your letter transmits additional information regarding the proposed remedial alternative presented previously, by your office, for Operable Unit 2 (OU2) at the CDE site.

I would like to take this opportunity to thank you for your participation in the Land Revitalization Workshop that was held in Newark, New Jersey on March 4, 2004. As was emphasized during the workshop, the U.S. Environmental Protection Agency (EPA) is committed to redeveloping Superfund sites, and we believe that the conceptual redevelopment plans that Cornell-Dubilier Electronics, Inc. and Dana Corporation, as the Hamilton Industrial Park Group (HIPG), have prepared in conjunction with the Borough of South Plainfield provide an opportunity to enhance the beneficial use of the CDE site.

As you are aware, the draft final Feasibility Study (FS) Report for OU2 (facility soils and buildings) at the CDE site has been submitted by EPA's contractor. While the FS is under review, I can share some aspects of EPA's remedial planning efforts, and how they comport with your April 1<sup>st</sup> letter. In developing the remedial alternatives for OU2, EPA took several factors into consideration, including the proposed redevelopment of the industrial park. As a result, the FS evaluates a "Principal Threat" alternative, similar to the alternative proposed by the HIPG to remediate contaminated soil at the industrial park. The "Principal Threat" alternative incorporates more aggressive techniques, such as excavation and off-site disposal for the worst areas of the site. EPA's August 1990 guidance, entitled: "A Guide on Remedial Actions at Superfund Sites with PCB Contamination" states that principal threats will include soils contaminated at industrial sites at concentrations greater than

or equal to 500 parts per million (ppm) total PCBs, and EPA accordingly looks to 500 ppm to define the Principal Threat, rather than 1,000 ppm as proposed by the HIPG. Less aggressive remedies, such as on-site capping, are considered for contaminated soils that pose less of a risk. Furthermore, institutional controls would be employed to ensure that any future activities are conducted in a manner that will not compromise the protectiveness of the cap at the site, with appropriate health and safety controls, and to prohibit future unrestricted use of the property.

EPA is in the process of reviewing the draft final FS Report and is also preparing a Proposed Plan that will identify EPA's Preferred Alternative to address contaminated soils and buildings at the industrial park. EPA strongly believes that the Preferred Alternative that will be presented in the Proposed Plan will allow for the beneficial reuse of the industrial park.

As part of EPA's continuing effort in the collaborative process with the HIPG, upon completion of EPA's review of the draft final FS for OU2 at the CDE site, Peter Mannino will provide the HIPG with a copy of the FS report. A copy will also be placed in the repository located at the South Plainfield Library and a copy will be provided to the elected officials in South Plainfield. It is anticipated that you should receive a copy of the FS report in May. Any comments that you may have on this report will gladly be accepted during the public comment period for the Proposed Plan.

If you have any additional questions or comments regarding this matter, please feel free to contact, Peter Mannino, at 212-637-4395.

Sincerely yours,



George Pavlou, Director  
Emergency and Remedial Response Division